

123442



NATIONAL ASPHALT PAVEMENT ASSOCIATION

NAPA Building ■ 5100 Forbes Boulevard ■ Lanham, Maryland, USA 20706-4413

Toll Free: 1-888-468-6499 ■ Tel: 301-731-4748 ■ Fax: 301-731-4621

Mike Acott, President

March 1, 2001

Mr. Stephen R. Kratzke
c/o Docket Management
National Highway Traffic Safety Administration
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKET
01 MAR 2 PM 12:01

RE: Docket No. NHTSA-2001-8827 -15

Dear Mr. Kratzke:

I am writing on behalf of the National Asphalt Pavement Association in support of Dan Hill and Associates, Inc.'s petition for temporary relief from Federal Motor Vehicle Safety Standard No. 224 (*Rear Impact Protection*) for the Flow Boy semi-trailer. The National Asphalt Pavement Association represents more the 1,000 companies engaged in the production or business of Hot Mix Asphalt.

As you know, Dan Hill and Associates, Inc. has made a good faith effort in trying to comply with Standard No. 224 since July 1997. Those efforts have resulted in an alternative rear impact guard that combines both under-ride protection (formed by the rear tire faces and the additional steel bumper) for the general public with a functioning product for the Hot Mix Asphalt industry. In addition, Dan Hill and Associates proposes to add high-visibility, flashing safety lights and safety signage, as well as light reflective tape to alert the motoring public.

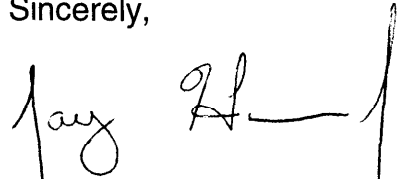
Dan Hill and Associates has made a compelling argument as to why it should be granted a temporary exemption from Standard No. 224. The National Asphalt Pavement Association concurs with Dan Hill and Associate's petition and urges you to expeditiously consider and approve the application.

Furthermore, the National Asphalt Pavement Association urges the National Transportation Safety Administration to review the impact of Standard No. 224 on the Hot Mix Asphalt industry. The review should consider alternatives, other than installing a rear impact guard that conforms to Federal Motor Vehicle Standard No. 223 (*Rear Impact Guards*) so that semi-trailer manufacturers could meet the under-ride protection standard without sacrificing functionality of its product.

Mr. Stephen R. Kratzke
March 1, 2001
Page 2

Thank you for your consideration of this request. Please do not hesitate to contact me if you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Hansen". The signature is stylized, with the first name "Jay" written in a cursive-like script and the last name "Hansen" in a more formal, blocky style. There is a horizontal line extending from the end of the signature.

Jay Hansen
Vice President, Government Affairs